Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Technological Transition of the	)	GN Docket No. 12-353
Nations Communications	)	
Infrastructure	)	
	)	

COMMENTS OF NATIONAL HISPANIC COUNCIL ON AGING AND NATIONAL HISPANIC MEDICAL ASSOCIATION

Dr. Yanira Cruz
President & Chief Executive Officer
National Hispanic Council on Aging
734 15th Street NW, Suite 1050
Washington, DC 20005
(202) 347-9733

Dr. Elena V. Rios
President & Chief Executive Officer
National Hispanic Medical Association
1920 L Street NW, Suite 725
Washington, D.C. 20036
(202) 628-5895

January 28, 2013

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of		
	)	
Technological Transition of the	)	GN Docket No. 12-353
Nations Communications	)	
Infrastructure	)	
	)	

Comments of
National Hispanic Council on Aging and National Hispanic Medical Association

The undersigned organizations ("we" or "our") file these comments in support of AT&T's Internet Protocol ("IP") Transition Petition ("AT&T Petition" or "Petition") that asks the FCC to launch a proceeding to hasten the TDM-to-IP transition. The Petition seeks to engage national policymakers in a dialogue and the creation of a process that will lead to the modernization of America's outdated communications networks. We urge the Commission to move forward with AT&T's request to speed, on a national basis, deployment of and access to IP-based networks capable of delivering new services and positive outcomes, including health benefits for all Americans, and in particular for the minority communities we serve.

I. AT&T's call for an IP transition can revolutionize healthcare opportunities for the minority community

The transition from legacy TDM-based communications networks to a 21st century all-IP infrastructure will result in modernized networks that can deliver important benefits and new services. We realize that the transition will not be simple or immediate, given the technological and regulatory complexity inherent in transitioning from existing legacy networks to the build out and adoption of new IP-based networks. We support AT&T's petition, however, because it acknowledges this fact while proposing a new process to achieve a path forward for an all-IP future.

Initiating a national conversation among government officials, industry leaders, and consumer advocates about the need to transition America's communications networks to an all-IP technology is a good first step. Rather than seeking broad and sweeping rule changes, AT&T's request is narrowly tailored as it seeks geographically limited trial runs of the transition in certain wire centers across the country. The trials would enable public input from stakeholders, including those in the healthcare field, facilitating a measured, open, and transparent transition to all-IP infrastructure.

We urge your swift approval of AT&T's pending Petition. High-speed IP-based services and applications can deliver a multitude of benefits to businesses and communities, and to various social sectors, particularly health care. Technological advances—including the continued development of telemedicine technologies; the implementation of digital platforms for the storage, maintenance, and sharing of electronic health records; and the use of innovative mobile apps by doctors and other medical personnel have revolutionized the delivery of health care throughout the world. More ubiquitous IP-based networks in the United States can produce additional innovations in this health care transformation, thereby benefitting patients, their families, medical professionals, and hospitals across the nation.

II. The United States healthcare industry leads the world, with telemedicine providing substantial benefits to minority communities

A. The United States health care industry leads the world and continues to drive job creation and economic growth.

The United States leads the world in both general and specialized health care services, thanks in part to utilizing the newest technologies to drive positive outcomes. In addition to delivering better health results, however, medical innovations and advanced health care services enabled by high-speed broadband can help drive our economy. In 2010, health care spending comprised about 17% of the U.S. GDP. The health care industry in the U.S. represents $1.75 trillion in revenues and is the largest health care services market in the world. This industry also drives job growth, employing over 14 million people, or 9% of the U.S. workforce. The U.S. Bureau of Labor Statistics estimates that, between 2008 and 2018, growth in the health care industry will generate 3.2 million new jobs. Jobs in home health care and diagnostic laboratories are projected to grow at the fastest rate, up to 40% over the next 10 years.

Dynamic, next-generation IP-based networks and IP-enabled services have fueled growth in high-bandwidth use sectors such as telehealth and telemedicine. Growth in these sectors has expanded access to specialized health care to many patients in traditionally underserved communities, and accelerating the transition to modern IP-based networks can further expand access. Recently, FCC Chairman Julius Genachowski recognized the urgent need for expediting both the deployment of broadband and the IP transition, stating that "broadband can revolutionize health care in our country, with powerful potential to improve quality of care for patients, while saving billions of dollars across the system."

B. Minorities in America are disproportionately affected by certain health issues and are especially in need of telemedicine and telehealth services.

American minorities disproportionately suffer from certain health problems and illnesses, including some chronic conditions. For example, some Hispanic groups are especially at risk for developing diabetes. In 2011, 13.2% of Mexican Americans had diabetes, compared to 7.6% of non-Hispanic whites. While not a panacea, telehealth has been proven to improve diabetes self-management in underserved communities.

Telehealth can help minorities better detect and manage other diseases disproportionately affecting them, too. A recent study found that text messages can be a "convenient, reliable, affordable, and secure means of telemedicine" to improve asthma management. Heart disease is another condition that disproportionately affects minorities. Among Hispanic groups, 30.7% of men and 30.9% of women suffer from cardiovascular disease, with 77.5% of men and 75.1% of women considered overweight. Hispanic women are likely to develop heart disease 10 years earlier than other women. Surveillance through Internet-based telemedicine has been shown to reduce hospital visits for heart failure patients compared to patients who just received traditional care, and the telemedicine surveillance may be helpful in reducing the cost of heart failure patient care.

C. The transition to advanced high speed IP-based networks can connect more minorities in America to advanced telemedicine and telehealth services, leading to better health and quality of life.

Increased access to 21st century networks will bring greater minority access to medical professionals and to advanced health care services. Difficulties obtaining quality health care could explain certain health disparities that exist in minority populations. Minorities face significant obstacles in accessing quality health care, including language or cultural barriers, travel time, and cost of care.

High-speed IP-based networks can bridge time and distance, eliminating or reducing obstacles to health care while simultaneously increasing access to services that can increase both life span and quality of life. Telehealth, in particular, is emerging as a critical delivery mechanism of expert medical care and services. In a recent survey, 27% of physician offices and 42% of hospitals indicated that they provided telemedicine services. Perhaps most importantly, broadband-enabled telemedicine services expand the reach of expert medical care, which is an especially positive development for minorities, considering that they constitute a large percentage of Americans currently without private sector health insurance.

D. mHealth is a transformative IP-based technology that will bring better, faster mobile service as well as the creation of more apps and wireless medical and wellness services.

Today, many telehealth and telemedicine services are delivered through various IP-enabled networks, both wired and wireless. The high bandwidth, data-intensive nature of health care apps and services, including the transfer of medical records between providers, requires a robust IP-enabled wired and wireless network that can transport substantial amounts of data to and from various cell sites. Next-generation high-speed mobile networks, and the services and applications they enable, are revolutionizing health care and expanding access to care for minorities.

IP-based networks and IP-enabled services can impact and improve daily life in significant ways. Broadband-enabled smartphones have become common and advanced; similarly, mobile health (or mHealth) is changing the medical care landscape. Consumers can now access health care information with just a few touches of a keypad or screen. As of September 2012, 38% of Hispanic cell phone owners reported using their phones to look up health/medical information. Among smartphone users, 15% of Hispanics have software applications on their phones to track or manage health.

Physicians and other medical care professionals have embraced the mHealth revolution, powered by IP-based networks. Many doctors now carry broadband-enabled mobile devices, such as smartphones and tablets, as they make their rounds, allowing easy access to patient records and the best available medical information. An estimated 81% of doctors use smartphones, up from 72% in 2010, according to a survey of physicians conducted by Manhattan Research in 2011. Additionally, one-half of tablet-owning doctors have used their mobile device at the point-of-care. Physicians almost doubled their use of tablets since 2011, reaching 62% in 2012, with the iPad as the dominant platform.

E. IP-enabled networks allow the rapid, secure, efficient transmission of medical health records and increased accuracy of diagnosis and care.

Electronic Health Records (EHR) have impacted the delivery of accurate and sustained diagnosis and treatment for patients, as well as offered greater efficiencies for the health care industry. To deliver additional benefits and to further accelerate the transition to state-of-the-art electronic recordkeeping, doctors and hospitals are making sustained investments in EHR. IP-based technologies are helping to ensure the rapid, reliable and secure transfer, sharing, and storage of those records between physicians and hospitals. A 2012 national survey conducted by the National Center for Health Statistics (NCHS) of the Centers for Disease Control (CDC) found that 55% of responding physicians had adopted EHR technology, and 85% of those physicians indicated that they were somewhat (47%) or very (38%) satisfied with their EHR systems. Additionally, three-fourths of physicians who use EHR technology stated that usage of their system "enhanced overall patient care"; half reported being alerted by the EHR system to critical lab results within 30 days of submission; and approximately 40% indicated that they had been alerted to potential medication errors, resulting in avoidance of errors.

F. Remote Monitoring: Telemedicine delivers improved quality of life, reduced inconvenience, and more consistent care through the use of remote monitoring.

Remote monitoring is "a service that gives the clinician the ability to monitor and measure patient health data and information over geographical, social, and cultural distances." The use of remote monitoring allows health care professionals to identify health problems sooner, reduce the need for hospitalization and emergency room visits, improve the quality of life of patients, and help save money. Remote monitoring provides greater access to medical care, which leads to "improved disease management, improved self-care management, and earlier and proactive interventions for positive outcomes." For example, 80% of patients being treated for neurologic diseases are currently monitored outside of a hospital. A meta-analysis of research studies on remote monitoring of patients with congestive heart failure concluded that the use of remote monitoring resulted in a 27%–40% reduction in overall admissions; additionally, Geisinger Health Plan recently reported that its use of a home monitoring program for patients with congestive heart failure reduced their readmission rate by 44%.

G. Telehealth, mHealth, and telemedicine provide great cost benefits to the medical industry and to consumers.

Consumers need and want to have medical and wellness information available to them, regardless of time or location, and that desire is driving the need for next-generation IP-based broadband networks. These advanced, high-speed networks and advanced services and applications play a vital role in expanding health care as well as telehealth platforms like mHealth, which help people participate in their own health management while also reducing medical costs. In the U.S., chronic disease treatment costs more than $1.4 trillion each year, but savings from mHealth technologies are predicted to reach $21.1 billion per year in the near future. One report predicts that using telehealth to promote preventative care, early intervention, and effective information-sharing could save the U.S. $3.61 billion annually. By reducing the number and need for face-to-face consultations for elderly patients, mHealth can reduce costs by 25%. Economist Robert Litan estimates that better management of chronic disease through the use of remote monitoring technologies could save as much as $197 billion over the next 25 years. The use of ongoing remote monitoring technologies and services has also been shown to reduce the rate of infections, saving an average of $12,000 per patient in the process.

III. Conclusion: High-speed broadband can continue to deliver astounding benefits in health care access for minorities if government and the private sector collaborate to ensure a smooth transition to all-IP networks.

IP-based technologies are transforming every aspect of America's health care system. IP-based networks have helped to unleash and promote innovation in health care, significantly increasing access to specialty care and medical information while simultaneously reducing consumer and industry costs. AT&T's Petition sets out a plan for government and the private sector to collaborate in order to achieve a speedy, seamless transition to all-IP networks and services. Quickly approving AT&T's Petition will accelerate this transition, spark substantial additional investment into America's communications infrastructure, promote additional growth in telehealth networks and services, and most importantly, improve the quality of and access to health care for minority communities across the country.

Respectfully submitted,

Dr. Yanira Cruz
President & Chief Executive Officer
National Hispanic Council on Aging
734 15th Street NW, Suite 1050
Washington, DC 20005
(202) 347-9733

Dr. Elena V. Rios
President & Chief Executive Officer
National Hispanic Medical Association
1920 L Street NW, Suite 725
Washington, D.C. 20036
(202) 628-5895

January 28, 2013